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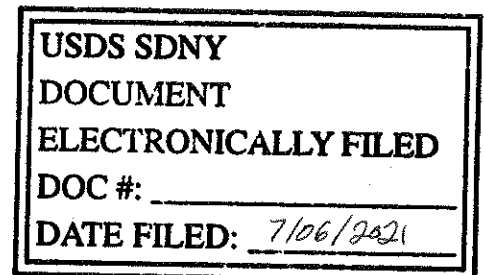
APPLICATION GRANTED
SO ORDERED

July 6, 2021

7/6/21
[Signature]
Via ECF

John G. Koeltl, U.S.D.J.

Hon. John G. Koeltl
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007



**Re: *Caldwell v. Willis Towers Watson US LLC* (No. 1:19-cv-6812-JGK-OTW)
Joint Request to Stay All Deadlines**

Dear Judge Koeltl:

This Firm represents Defendant Willis Towers Watson US LLC (WTW) in the above-referenced case. Following the discussion at the May 26, 2021 pre-motion conference the parties agreed to participate in private mediation. This mediation will occur on October 7, 2021, which is the first availability the parties' agreed-upon mediator has on her calendar. In light of this agreement, the parties jointly request that the Court stay all deadlines in this litigation in an effort to save the parties from needing to expend potentially-unnecessary attorneys' fees. This would include, specifically, staying all deadlines associated with WTW's motion for summary judgment. *See* ECF No. 70 (motion briefing schedule). The parties will file a joint status report and/or a new briefing schedule by November 5, 2021.

This is the parties' first request to stay all deadlines following the close of discovery. Earlier in this case, the parties requested that all deadlines be stayed while the parties participated in a Settlement Conference before Magistrate Judge Wang, which the Court granted. *See* ECF No. 27. No currently-set deadlines or appearances, except for the summary judgment briefing schedule (ECF No 70), will be affected by the requested stay. Plaintiff joins and consents to this request.

Thank you for your time and consideration.

Respectfully submitted,

/s/ Gary B. Eidelman

Gary B. Eidelman

cc: All counsel (via ECF)

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